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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOSH MYERS, as Parent and Legal
Guardian on behalf of EKS, a minor child,

Plaintiff,

vs.

NYE COUNTY, a County of State of
Nevada; DEPARTMENT OF PUBLIC
SAFETY, DIVISION OF NEVADA
HIGHWAY PATROL, a political
subdivision of the STATE OF NEVADA;
NYE COUNTY DEPUTY BREANNA
NELSON; NYE COUNTY LIEUTENANT
ALAN W. SHRIMP; NYE COUNTY
DETECTIVE BROOKE GENTRY; NYE
COUNTY DEPUTY MICHAEL MOKESKI;
NYE COUNTY TRAINEE ISAAC
CHAMPLIN; NYE COUNTY DETECTIVE
DANIEL FISCHER; NEVADA HIGHWAY
PATROL TROOPER LUKE STANG; DOE
OFFICERS, AGENTS, or the like I through
X, Inclusive; and ROE CORPORATIONS I
through X, inclusive, ROE AGENCIES OR
POLITICAL SUBDIVISIONS I-X

Defendants.

Case No.: 2:23-cv-00478-CDS-EJY

**JOINT STIPULATION TO EXTEND
RESPONSE DEADLINES**

Plaintiff Josh Myers, as Parent and Legal Guardian on behalf of EKS, a minor child,
by and through counsel, Boyd B. Moss III, Esq., and Defendants Daniel Fischer, Isaac
Champlin, Brooke Gentry, Alan W. Shrimpf, Department of Public Safety, Division of
Nevada Highway Patrol, Michael Mokeski, and Nye County, by and through their

1 respective counsels, have conferred and hereby stipulate to extend Defendants' deadline to
2 respond to Plaintiff's Complaint for ninety (90) days.

3 The parties submit there is good cause for the extension. Plaintiff intends to seek
4 consolidation of this matter with the related action *Roberts v. Nye County, et al.*, Case No.
5 2:22-cv-00398-RFB-EJY. However, additional time is needed to allow the parties to discuss
6 consolidation and related issues, including how consolidation may impact the status of the
7 pending defense motions in the *Roberts* case. Further, consolidation may obviate the need
8 for Defendants to respond in this action and promote judicial economy. Accordingly, the
9 parties hereby agree to the following case management deadline:

10 The deadline for Defendants Daniel Fischer, Isaac Champlin, Brooke Gentry, Alan
11 W. Shrimpf, Department of Public Safety, Division of Nevada Highway Patrol, Michael
12 Mokeski, and Nye County to respond to Plaintiff's Complaint is extended for ninety (90)
13 days, with responsive pleadings due no later than August 24, 2023.

14 In the event Plaintiff serves any other Defendant prior to August 3, 2023, the
15 deadline for any such Defendant to respond to Plaintiff's Complaint is August 24, 2023.

16 **IT IS SO STIPULATED.**

17 DATED this 25th day of May 2023.

DATED this 25th day of May 2023.

19 /s/Boyd B. Moss

20 Boyd B. Moss III, Esq.
21 Marcus A. Berg, Esq.
22 John C. Funk, Esq.
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*Attorneys for Defendants Breanna
Nelson, Alan W. Shrimpf, Brooke
Gentry, Michael Mokeski, Isaac
Champlin, and Daniel Fischer*

DATED this 25th day of May 2023.

DATED this 25th day of May 2023.

/s/Stephanie Bedker

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*Attorneys for Defendant Department of
Public Safety, Division of Nevada
Highway Patrol*

ORDER

IT IS SO ORDERED. The deadline for Defendants Daniel Fischer, Isaac Champlin, Brooke Gentry, Alan W. Shrimpf, Department of Public Safety, Division of Nevada Highway Patrol, Michael Mokeski, and Nye County to respond to Plaintiff's Complaint is extended for ninety (90) days up to and including August 24, 2023.

In the event Plaintiff serves any other Defendant prior to August 3, 2023, the deadline for any such Defendant to respond to Plaintiff's Complaint is August 24, 2023.

DATED: May 30, 2023


UNITED STATES MAGISTRATE JUDGE